

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND/ODESSA DIVISION**

INTELLECTUAL VENTURES I LLC and  
INTELLECTUAL VENTURES II LLC,

*Plaintiffs,*

v.

SOUTHWEST AIRLINES CO.,

*Defendant.*

**Civil Action No. 7:24-cv-00277-ADA**

**JURY TRIAL DEMANDED**

**NOTICE OF INTENT TO PROCEED WITH VENUE DISCOVERY**

Plaintiffs Intellectual Ventures I LLC and Intellectual Ventures II LLC (“Plaintiffs” or “IV”), file this Notice to inform all parties and the Court of its intent to proceed with venue discovery in accordance with the Court’s Standing Order Regarding Patent Proceedings.

On February 28, 2025, Defendant Southwest Airline Co. (“Defendant” or “Southwest”) filed a Motion to Transfer Venue [Dkt. No. 21].

Plaintiffs hereby provide notice of its intent to proceed with venue discovery and briefing as outlined in the agreed-upon schedule:

EVENT	DATE/DEADLINE
Initial Motion Filed	February 28, 2025
Venue Discovery Cut-Off	May 9, 2025
Plaintiffs Response Brief	May 23, 2025

Dated: March 11, 2025

RESPECTFULLY SUBMITTED,

By: /s/ Mark D. Siegmund

Jonathan K. Waldrop (CA Bar No. 297903)

(Admitted in this District)

jwaldrop@kasowitz.com

Darcy L. Jones (CA Bar No. 309474)

(Admitted in this District)

djones@kasowitz.com

Marcus A. Barber (CA Bar No. 307361)

(Admitted in this District)

mbarber@kasowitz.com

John W. Downing (CA Bar No. 252850)

(Admitted in this District)

jdowning@kasowitz.com

Heather S. Kim (CA Bar No. 277686)

(Admitted in this District)

hkim@kasowitz.com

ThucMinh Nguyen (CA Bar No. 304382)

(Admitted in this District)

tnguyen@kasowitz.com

**KASOWITZ BENSON TORRES LLP**

333 Twin Dolphin Drive, Suite 200

Redwood Shores, California 94065

Telephone: (650) 453-5170

Facsimile: (650) 453-5171

Mark D. Siegmund (TX Bar No. 24117055)

msiegmund@cjsjlaw.com

**Cherry Johnson Siegmund James PLLC**

7901 Fish Pond Rd., 2nd Floor

Waco, Texas 76710

Telephone: 254-732-2242

Facsimile: 866-627-3509

*Attorneys for Intellectual Ventures I LLC and  
Intellectual Ventures II LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument was served or delivered electronically to all counsel of record, on this 11th day of March 2025, via the Court's CM/ECF System.

/s/ Mark D. Siegmund

Mark D. Siegmund